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6 *Attorneys for Non-Party*  
7 *Samsung Electronics Co., Ltd.*

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

EPIC GAMES, INC.,

CASE NO. 4:20-cv-05640-YGR

Plaintiff, Counter-Defendant,

DECLARATION OF SANGHOON PARK  
IN SUPPORT OF EPIC GAMES INC.'S  
ADMINISTRATIVE MOTION TO SEAL  
TRIAL EXHIBITS

v.

APPLE INC.,

Defendant, Counterclaimant.

## **DECLARATION OF SANGHOON PARK**

I, Sanghoon Park, declare as follows:

3       1. I am a Vice President at Samsung Electronics Co., Ltd. (“SEC”) with responsibility  
4 for Global Legal Affairs. I have been employed at SEC since 2004, and in the course of my  
5 employment have become familiar with SEC’s treatment of its trade secrets and other proprietary  
6 business information, such as those discussed in this declaration. I make this declaration pursuant  
7 to Northern District of California Civil Local Rule 79-5(e)(1) in support of Epic Games’  
8 administrative motion to seal trial exhibits. I know the facts stated herein based on my own personal  
9 knowledge and, if called as a witness, I could and would testify competently thereto.

10        2. I understand that Epic Games, Inc. and Apple, Inc. intend to use at trial materials that  
11 include highly sensitive, confidential information of SEC. Those materials include potential trial  
12 exhibit DX-4153. Exhibit DX-4153 is a set of detailed notes concerning a May 17, 2018 meeting  
13 between executives at SEC and Epic Games. The notes reflect the terms of the proposed partnership  
14 between SEC and Epic Games, the strategy the two companies would employ going forward, the  
15 revenue sharing arrangement between the two companies, and Samsung's future product launches  
16 and related strategies. The public disclosure of exhibit DX-4153, which includes SEC's business  
17 analyses, strategies, and decision-making plans, could significantly harm SEC and its ability to  
18 conduct business, and could place it at a disadvantage with competitors who could use SEC's  
19 confidential information to their advantage. Exhibit DX-4153 has economic value from not being  
20 known to SEC's competitors or the public. It is SEC's practice to maintain as highly confidential  
21 all of its non-public, strategy-related documents and communications with its partners. SEC does  
22 not disclose strategy-related documents of this nature outside of SEC.

24 I declare under penalty of perjury of the laws of the United States of America that the  
25 foregoing is true and correct. This declaration was executed this 6 day of May 2021, in

26 Suwon, Korea

Wolff

Sanghoon Park